

RE: **THYSSEN KRUPP BUDD 113-16698-00018**

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

February 12, 2003

Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

February 12, 2003

Mr. Fred Dannhauser
ThyssenKrupp Budd Company
2620 Marion Drive
Kendallville, Indiana 46755

Re: 113-16698-00018
Second Administrative Amendment to
Part 70 T113-6873-00018

Dear Mr. Dannhauser:

Budd Company Plastics Division was issued a permit on September 28, 1999 for a stationary fiberglass reinforced plastic automotive parts production operation. A letter requesting a change of operating name was received on January 23, 2003. Pursuant to the provisions of 2-7-11(a)(1) and (2) the permit is hereby administratively amended as follows:

Effective October 1, 2002, Budd Company Plastics Division changed their operating name to ThyssenKrupp Budd Company. This was not an ownership change. The Responsible Official remains as Mr. Fred Dannhauser who meets the responsibilities of 326 IAC 2-7-1(34)(A)(vi).

Some typographical changes were made to the permit. Due to a recent name change, all references to Office of Air Management (OAM) were changed to reflect the Office of Air Quality (OAQ). On January 26, 2001, the First Administrative Amendment 113-12921-00018 was issued. The changes on the cover letter were not added to the permit replacement pages. These were posted to the permit in Section A and Section D. The pages were realigned to mirror the original permit page numbering and setup. All the reporting forms were changed to reflect the new operating name.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gary Freeman, at (800) 451-6027, press 0 and ask for Gary Freeman or extension 3-5334, or dial (317) 233-5334.

Sincerely,

Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments: Replacement Pages

PD/gkf

cc: File - Noble County
Noble County Health Department
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Karen Ampil
IDEM Northern Regional Office

Permit Review Section 1 - Gary Freeman
Air Programs - Chet Bohannon

PART 70 OPERATING PERMIT

OFFICE OF AIR QUALITY

ThyssenKrupp Budd Company
2620 Marion Drive
Kendallville, Indiana 46755

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T113-6873-00018	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: September 28, 1999 Expiration Date: September 28, 2004

First Administrative Amendment 113-12921-00018, issued January 26, 2001

First Reopening 113-13436-00018, issued November 29, 2001

Second Administrative Amendment: 113-16698-00018	Pages Affected: 5, 6, 7, 8, 9, 32, 33, 34, 35, 36, 39, 40, 41, 42 and 43
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 12, 2003

SECTION A**SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary fiberglass reinforced plastic automotive parts production operation.

Responsible Official: Fred Dannhauser
Source Address: 2620 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2620 Marion Drive, Kendallville, Indiana 46755
Phone Number: 219-347-5973
SIC Code: 3089
County Location: Noble
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) 4800 ton compression molding press, identified as PR01, constructed in April 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (2) One (1) 3600 ton compression molding press, identified as PR02, constructed in April 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (3) One (1) 3600 ton compression molding press, identified as PR03, constructed in April 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (4) One (1) 1800 ton compression molding press, identified as PR04, constructed in May 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (5) One (1) 1800 ton compression molding press, identified as PR05, constructed in May 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (6) One (1) 1800 ton compression molding press, identified as PR06, constructed in June 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);

- (7) One (1) 900 ton compression molding press, identified as PR07, constructed in May 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (8) One (1) 1850 ton compression molding press, identified as PR08, constructed in November 1998, with maximum capacity of 312.5 pounds in input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (9) One (1) 1800 ton compression molding press, identified as PR09, constructed in October 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (10) One (1) 4200 ton compression molding press, identified as PR11, constructed in October 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (11) One (1) 1800 ton compression molding press, identified as PR12, constructed in October 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (12) One (1) 1850 ton compression molding press, identified as PR13, constructed in November 1998, with maximum capacity of 312.5 pounds of input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (13) One (1) 1850 ton compression molding press, identified as PR14, constructed in November 1998, with maximum capacity of 312.5 pounds of input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (14) One (1) 1850 ton compression molding press, identified as PR15, constructed in November 1998, with maximum capacity of 312.5 pounds of input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (15) One (1) 330 ton compression molding press, identified as PR20, constructed in April 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (16) One (1) 330 ton compression molding press, identified as PR21, constructed in March 1995, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (17) One (1) manual and robotic air atomization spray booth, identified as B01, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S11 and S12);
- (18) One (1) manual and robotic air atomization spray booth, identified as B02, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S13 and S14);
- (19) One (1) manual and robotic air atomization spraying and electrostatic disc spraying booth,

identified as B03, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S17 and S18);

- (20) One (1) manual and robotic air atomization spraying and electrostatic disc spraying booth, identified as B04, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S19 and S20);
- (21) One (1) secondary finishing operation for smoothing the molded parts, using a dust collection system as control.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
 - (a) One (1) natural gas or propane fired boiler, identified as BR01, constructed in September 1988, with maximum heat input capacity of 8.369 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (S24)
 - (b) One (1) natural gas or propane fired boiler, identified as BR02, constructed in September 1988, with maximum heat input capacity of 8.369 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (S24)
 - (c) One (1) natural gas or propane fired paint bake oven, identified as BA01, constructed in December 1988, with maximum heat input capacity of 8.8 million British thermal units per hour (mmBtu/hr), exhausting to two (2) stacks (S22 and S23)
- (2) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour;
- (3) Combustion source flame safety purging on startup;
- (4) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (5) VOC and HAP storage vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (6) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (7) Cleaners and solvents characterized as follows:

- (a) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
- (b) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F);

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

- (8) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (9) Closed loop heating and cooling systems;
- (10) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (11) Forced and induced draft cooling tower system not regulated under a NESHAP;
- (12) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (13) Heat exchanger cleaning and repair;
- (14) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (15) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (16) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment;
- (17) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;
- (18) On-site fire and emergency response training approved by the department;
- (19) Diesel generators not exceeding 1600 horsepower;
- (20) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations;
- (21) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kPa measured at 38 degrees C);

ThyssenKrupp Budd Company

Kendallville, Indiana
Permit Reviewer: FLL

Page 9 of 43
OP No. T113-6873-00018

(22) A laboratory as defined in 326 IAC 2-7-1(20)(C);

- (23) Other activities or categories not previously identified:

Insignificant Thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO₂) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NO_x) = 5 lbs/hour or 25 lbs/day Volatile Organic compounds (VOC) = 3 lbs/hour or 15 lbs/day

- (a) Touch Up Areas A, B, C, D, E, F, G, H, I, J;
- (b) Bonding Areas A, B, C, D, E, F, G, H, I, J, K, L, M, N, O, P; and
- (c) Touch Up Booth A and Touch Up Booth B.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

ThyssenKrupp Budd Company

Kendallville, Indiana
Permit Reviewer: FLL

Page 32 of 43
OP No. T113-6873-00018

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) 4800 ton compression molding press, identified as PR01, constructed in April 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (2) One (1) 3600 ton compression molding press, identified as PR02, constructed in April 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (3) One (1) 3600 ton compression molding press, identified as PR03, constructed in April 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (4) One (1) 1800 ton compression molding press, identified as PR04, constructed in May 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (5) One (1) 1800 ton compression molding press, identified as PR05, constructed in May 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (6) One (1) 1800 ton compression molding press, identified as PR06, constructed in June 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (7) One (1) 900 ton compression molding press, identified as PR07, constructed in May 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (8) One (1) 1850 ton compression molding press, identified as PR08, constructed in November 1998, with maximum capacity of 312.5 pounds in input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (9) One (1) 1800 ton compression molding press, identified as PR09, constructed in October 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (10) One (1) 4200 ton compression molding press, identified as PR11, constructed in October 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (11) One (1) 1800 ton compression molding press, identified as PR12, constructed in October 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (12) One (1) 1850 ton compression molding press, identified as PR13, constructed in November 1998, with maximum capacity of 312.5 pounds of input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (13) One (1) 1850 ton compression molding press, identified as PR14, constructed in November 1998, with maximum capacity of 312.5 pounds of input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (14) One (1) 1850 ton compression molding press, identified as PR15, constructed in November 1998, with maximum capacity of 312.5 pounds of input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (15) One (1) 330 ton compression molding press, identified as PR20, constructed in April 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (16) One (1) 330 ton compression molding press, identified as PR21, constructed in March 1995, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);

- (17) One (1) manual and robotic air atomization spray booth, identified as B01, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S11 and S12);
- (18) One (1) manual and robotic air atomization spray booth, identified as B02, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S13 and S14);
- (19) One (1) manual and robotic air atomization spraying and electrostatic disc spraying booth, identified as B03, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S17 and S18);
- (20) One (1) manual and robotic air atomization spraying and electrostatic disc spraying booth, identified as B04, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S19 and S20);
- (21) One (1) secondary finishing operation for smoothing the molded parts, using a dust collection system as control.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements), CP No. 113-3288-00018, issued February 4, 1994 and CP No. 113-4116-00018, issued January 27, 1995, the robotic painting operation shall consist of electrostatic spraying with an organic solvent concentration of 9.0 pounds of VOC per gallon of solids (4.05 pounds of VOC per gallon of coating, excluding water). The organic solvent concentration of the coatings shall be re-evaluated on an annual basis. In order to effect successful application by the electrostatic system it is necessary first to lay down a very thin layer of coating by the conventional air atomized application system.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit VOCs is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) The input VOC from the four (4) paint booths and the sixteen (16) compression molding presses shall be limited such that the potential to emit (PTE) volatile organic compounds shall be less than 230 tons per twelve (12) consecutive month period, rolled on a monthly basis. Compliance with this limit shall be determined based upon the following criteria:
 - (1) The input VOC from the four (4) paint booths shall be considered equivalent to VOC emissions.
 - (2) Monthly usage by weight and monomer content for styrene shall be recorded. Emission factors shall be obtained from the reference approved by IDEM, OAQ. Styrene emissions shall be calculated using the following equation:

$$\text{Potential to Emit (tons/year)} = \text{Styrene containing material usage (tons/year)} * \text{weight percent styrene} * \text{weight percent emitted}$$

- (3) $(\text{input VOC from the four (4) paint booths}) + [\text{input VOC from the sixteen (16) compression molding presses: } (\text{Styrene containing material usage (tons/year)} * \text{weight percent styrene} * \text{weight percent emitted})] < 230 \text{ tons per twelve (12)}$

ThyssenKrupp Budd Company

Kendallville, Indiana
Permit Reviewer: FLL

Page 35 of 43
OP No. T113-6873-00018

consecutive month period

- (c) Any change or modification which may increase the potential to emit of VOCs or any other criteria pollutant to 250 tons per year or greater, from the equipment covered in this permit, shall require approval from IDEM, OAQ before such change may occur.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from the four (4) spray booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the four (4) spray booths and the waterwash and baffle control devices.

Compliance Determination Requirements**D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) and Particulate Matter (PM) limits specified in Conditions D.1.1, D.1.2, and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.8 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the waterwash and baffles for PM control shall be in operation at all times when the four (4) spray booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**D.1.9 Monitoring**

- (a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (S11, S12, S13, S14, S17, S18, S19 and S20) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**D.1.10 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: ThyssenKrupp Budd Company
Source Address: 2620 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2620 Marion Drive, Kendallville, Indiana 46755
Part 70 Permit No.: T113-6873-00018

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY

COMPLIANCE DATA SECTION

P.O. Box 6015

100 North Senate Avenue

Indianapolis, Indiana 46206-6015

Phone: 317-233-5674

Fax: 317-233-5967

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: ThyssenKrupp Budd Company
Source Address: 2620 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2620 Marion Drive, Kendallville, Indiana 46755
Part 70 Permit No.: T113-6873-00018

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
- ☐ The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - ☐ The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
- ☐ The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY

COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: ThyssenKrupp Budd Company
 Source Address: 2620 Marion Drive, Kendallville, Indiana 46755
 Mailing Address: 2620 Marion Drive, Kendallville, Indiana 46755
 Part 70 Permit No.: T113-6873-00018
 Facility: four (4) paint booths and sixteen (16) compression molding presses
 Parameter: input Volatile Organic Compounds (VOCs)
 Limit: less than 230 tons per 12 consecutive month period, rolled on a monthly basis based on the following equation: (input VOC from the four (4) paint booths) + [input VOC from the sixteen (16) compression molding presses: (Styrene containing material usage (tons/year) * weight percent styrene * weight percent emitted)]

YEAR: _____

Month	Emission Unit	VOC Usage (tons/month) <i>This Month</i>	VOC Usage (tons) <i>Previous 11 Months</i>	VOC Usage (tons) <i>12 Month Total</i>
	four (4) paint booths			
	sixteen (16) compression molding presses			
	four (4) paint booths			
	sixteen (16) compression molding presses			
	four (4) paint booths			
	sixteen (16) compression molding presses			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: ThyssenKrupp Budd Company
Source Address: 2620 Marion Drive, Kendallville, Indiana 46755
Mailing Address: 2620 Marion Drive, Kendallville, Indiana 46755
Part 70 Permit No.: T113-6873-00018

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.